EXHIBIT 2

Page 1

THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

RUBEN ROMERO,

Plaintiff(s),

vs.

No. 1:21-cv-00544-KG-CG

CORE CIVIC, INC.,
CORE CIVIC OF TENNESSEE, LLC.,
WARDEN BRIAN KOEHN,
ANA PADILLA and
GARRICK PETERSON,

Defendant(s).

DEPOSITION OF GARRICK PETERSON

MARCH 15, 2022 9:22 A.M. VIA ZOOM

PURSUANT TO THE NEW MEXICO RULES OF CIVIL PROCEDURE, this deposition was:

TAKEN BY: ALYSSA QUIJANO, ESQ. ATTORNEY PLAINTIFF

	Page 10		Page 12
1	hearing you.	1	Q. Okay. And when did that happen?
2	A. Okay.	2	A. August 2018.
3	Q. Okay?	3	Q. And when that happened, was there some kind of
4	And was that summer job between school	4	investigation into your behavior, or were you just
5	semesters?	5	terminated after you were found falling asleep?
6	A. Yeah. In the summer.	6	MR. BOJANOWSKI: I'm going to
7	Q. In the summer.	7	objection.
8	And it was between your school semesters	8	Go ahead and answer.
9	at UNM or when you were in high school?	9	THE WITNESS: What was that?
.0	A. In high school.	10	Q (By Ms. Quijano) He objected, but you can go
.1	Q. Okay. And are you still at the CoreCivic jail?	11	ahead and answer.
.2	A. No.	12	A. Oh. Um, what was the question again?
.3	Q. Okay. Where do you work now?	13	Q. Was there any investigation into your behavior
4	A. I work at a hospital in Gallup.	14	when you fell asleep, or did they just terminate you
.5	Q. Okay. And when did you start there?	15	when they learned you had fallen asleep?
6	A. May 2020.	16	MR. BOJANOWSKI: Objection.
7	Q. And did you have any job in between CoreCivic	17	THE WITNESS: I think there might have
.8	and the hospital?	18	been an investigation, yeah.
9	A. Yeah, I did.	19	Q (By Ms. Quijano) Okay. And do you know the
0	Q. Okay. What was that job?	20	outcome of that investigation, if there was one?
1	A. Yeah, I was a a water tech at on the	21	MR. BOJANOWSKI: Same objection.
2	Navajo Nation a place called Navajo Nation Water	22	Go ahead.
3	Management.	23	THE WITNESS: No, I don't know.
4	Q. Okay. And when did you start there?	24	Q (By Ms. Quijano) Were you
15	A. I don't really know on the dates of that one	25	A. Just terminated.
	Page 11		Page 13
1	Page 11 there.	1	Page 13 Q. Okay. Were you interviewed, at all, about the
		1 2	
2	there.		Q. Okay. Were you interviewed, at all, about the
2	there. Q. Okay. Do you know how long you worked there?	2	Q. Okay. Were you interviewed, at all, about the incident?
2 3 4	there. Q. Okay. Do you know how long you worked there? A. Six months.	2 3	Q. Okay. Were you interviewed, at all, about the incident? A. No.
2 3 4 5	there. Q. Okay. Do you know how long you worked there? A. Six months. Q. And do you know when you left?	2 3 4	Q. Okay. Were you interviewed, at all, about the incident? A. No. Q. Okay. How did they learn you had fallen
2 3 4 5	there. Q. Okay. Do you know how long you worked there? A. Six months. Q. And do you know when you left? A. No.	2 3 4 5	Q. Okay. Were you interviewed, at all, about the incident? A. No. Q. Okay. How did they learn you had fallen asleep?
2 3 4 5 6	there. Q. Okay. Do you know how long you worked there? A. Six months. Q. And do you know when you left? A. No. Q. Okay. Sometime before May 2020?	2 3 4 5 6	 Q. Okay. Were you interviewed, at all, about the incident? A. No. Q. Okay. How did they learn you had fallen asleep? A. One of the the lieutenants came and found me.
2 3 4 5 6 7	there. Q. Okay. Do you know how long you worked there? A. Six months. Q. And do you know when you left? A. No. Q. Okay. Sometime before May 2020? A. Yeah.	2 3 4 5 6 7	 Q. Okay. Were you interviewed, at all, about the incident? A. No. Q. Okay. How did they learn you had fallen asleep? A. One of the the lieutenants came and found
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2 3 4 5 6 7 8	there. Q. Okay. Do you know how long you worked there? A. Six months. Q. And do you know when you left? A. No. Q. Okay. Sometime before May 2020? A. Yeah. Q. Okay. And any job okay. So, I guess when did you stop working at the CoreCivic? A. It was six months after March, so in August or September Q. Okay. A of that year, 2018. Q. And why'd you leave? A. Termination. Q. Okay. Why were you terminated? A. Falling asleep in one of the units. Q. Do you remember which unit that was? A. Unit 400. Q. Do you know which pod? A. No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay. Were you interviewed, at all, about the incident? A. No. Q. Okay. How did they learn you had fallen asleep? A. One of the the lieutenants came and found me. Q. Okay. Had you slept on the job before that? MR. BAJANOWSKI: Objection. Go ahead. (Court reporter clarification.) MR. BOJANOWSKI: It's just an objection for the record, form. Q (By Ms. Quijano) Go ahead and answer. A. Can you repeat the question? Q. Yeah. Had you ever fallen asleep on the job before that? A. No. MR. BOJANOWSKI: Same objection. Q (By Ms. Quijano) When the lieutenant found you

	Page 14		Page 16
1	A. Just walked away.	1	Q. Okay.
2	Q. Okay. Did you receive any like written like	2	A. After that I was with a company, Desert Wall
3	any write-up?	3	Security, and I was working at the Gallup Wal-Mart. And
4	A. Yeah. For that one, yeah.	4	that was for two months.
5	Q. Okay. And then you were terminated afterwards?	5	Q. Okay. And why'd you leave the job at Wal-Mart?
6	A. Yeah.	6	A. To get the job at the hospital.
7	MR. BOJANOWSKI: Same objection.	7	Q. Okay. Was the security job different than the
8	Q (By Ms. Quijano) You said for that one, were	8	Wal-Mart job?
9	there other incidents that you weren't that you were	9	A. Oh, the same security at Wal-Mart.
10	in trouble but didn't get a write-up?	10	Q. Okay. So, I have you said you had three
11	A. I don't know. I don't remember.	11	other jobs. So, I have loading fireworks for a day,
12	Q. Okay. Were you ever disciplined before you	12	security at Wal-Mart.
13	were terminated, aside from falling asleep at that time?	13	A. Yeah.
14	A. Um	14	Q. Is there another job?
15	MR. BOJANOWSKI: Objection.	15	A. No I mean, the water management branch.
16	Go ahead.	16	Three jobs, that's three.
17	Q (By Ms. Quijano) Go ahead.	17	Q. Okay. There were three between the jail and
18	A. No.	18	the hospital?
19	Q. Okay. Okay. So, after you were terminated,	19	A. Yeah.
20	where did you work next?	20	Q. Okay. And why did you leave the water tech
21	A. At the water management branch.	21	company?
22	Q. Okay. And that was the six-month stint before	22	A. To it was a contract for six months.
23	you went to the hospital?	23	Q. Okay. Ever been fired from any other jobs?
24	A. Yeah. No, no, I had another job.	24	A. No.
25	Q. Okay.	25	Q. Okay. Ever been disciplined in any other jobs?
	Page 15		Page 17
1	A. Three more jobs after that.	1	A. No. Just the CoreCivic one.
2	(Court reporter clarification.)	2	Q. Okay. Any verbal reprimands, warnings at any
3	Q (By Ms. Quijano) Three more jobs after that?	3	job?
4	A. Yeah.	4	A. No.
5	Q. Okay. What were	5	Q. Okay. So, when you started at CoreCivic, what
6		6	was your position?
7	(Court reporter clarification.) MS. QUIJANO: Three more jobs is what I	7	A. Detention officer.
	think he said.		
8 9		8 9	Q. Okay. And were you assigned to a specific pod?A. Yeah. Unit 400.
		10	Q. Okay. So, you always worked Unit 400?
10	computer and speak up A. Yeah.	11	
11		12	A. Yeah. But some days I would be somewhere else.Q. Where would you be?
12 13	Q because the court reporter is having a hard	13	A. I've been to 600, solitary, 500.
13	time hearing you. It's going to make it really unclear what you're testifying to. Okay?		-
14		14	Q. Okay. And why were you working in those other
15	A. Okay.	15	pods those times?
16	Q. Okay. You have three more jobs after that.	16	A. To relieve those officers. Because I guess
17	What other jobs did you have after you were	17	some of the officers didn't come in to relieve them for
18	terminated or after the water tech job, what were	18	their shift.
19	your other jobs?	19	Q. Okay. So, it was a staffing issue that you
20	A. After that I worked a month on the north side	20	would cover?
21	of Gallup loading fireworks, that was one.	21	A. Yeah.
~ ~	Q. Okay. How long	(22)	Q. When you were working there, were you was
	A. That one was	23	the facility understaffed?
23			ALD DOLLAROTTECTT OLL
22232425	Q. How long did you do that? A. For a day.	(24) (25)	MR. BOJANOWSKI: Objection. Go ahead and answer.

	Page 18		Page 20
1	THE WITNESS: I don't know.	1	MR. BOJANOWSKI: Objection.
2	Q (By Ms. Quijano) Do you know if there was	2	Go ahead.
3	frequently officers that weren't coming in and shifts	3	THE WITNESS: I don't know.
4	needed to be covered?	4	Q (By Ms. Quijano) What were they complaining
5	MR. BOJANOWSKI: Same objection.	5	about, if you know?
6	Go ahead and answer.	6	MR. BOJANOWSKI: Same objection.
7	THE WITNESS: Yeah.	7	Go ahead.
8	Q (By Ms. Quijano) How often was that happening?	8	THE WITNESS: Long hours.
9	MR. BOJANOWSKI: Same objection.	9	Q (By Ms. Quijano) Were you able were each
10	Go ahead.	10	shifts properly staffed? So, like when people were
11	THE WITNESS: Often.	11	working long hours, did you have enough people in the
12	Q (By Ms. Quijano) Sorry. Often?	12	jail at each time? That needed to be staffed in each
13	A. Yeah.	13	section of the jail?
14	Q. Okay. Did you end up having to cover lots of	14	A. Yeah.
15	shifts because people weren't showing up for their	15	MR. BOJANOWSKI: Same objection.
16	assigned shift?	16	Go ahead.
17	MR. BOJANOWSKI: Same objection.	17	THE WITNESS: Yeah.
18	THE WITNESS: Yeah.	18	Q (By Ms. Quijano) Okay. So, the problem was not
19	Q (By Ms. Quijano) Okay. Did that lead you to	19	that there weren't enough people in the jail at one
20	working long hours at the jail?	20	time, but that everyone was tired. Is that accurate
21	A. Yeah.	21	or
22	Q. How many hours a week, on average, do you think	22	(Court reporter clarification.)
23	you worked when you were working at the jail?	(23)	MS. QUIJANO: Sorry.
24	A. A week, probably 60 to 50.	24	Q (By Ms. Quijano) Everyone's tired and they're
25	Q. And that was average for you?	25	overworked.
1	Page 19 A. Yeah.	1	Is that fair to say?
2	Q. Okay. Did you ever complain about the number	2	MR. BOJANOWSKI: Same objection.
3	of hours that you were working?	3	Go ahead.
4	A. No.	4	THE WITNESS: Can you repeat the question?
5	O. No.	5	Q (By Ms. Quijano) Yeah, sure.
6	Were other guards working 50 to 60-hour	6	I just am trying to get a sense of the
7	weeks as well?	7	complaints. So, were the problems in the jail at that
8	MR. BOJANOWSKI: Same objection.	8	time not that there weren't enough people at one time,
9	THE WITNESS: Yeah.	9	but that the people that were there were overworked and
10	Q (By Ms. Quijano) Were most of the staff working	10	tired?
	50 to 60-hour weeks?	11	MR. BOJANOWSKI: Same objection.
	TO TO OU HOUR IT CORD!		THE DOLL OF THE PARTY OF THE PROPERTY.
11	MR_BOIANOWSKI: Same objection		
11 12	MR. BOJANOWSKI: Same objection. O (By Ms. Quijano) Would you repeat your answer?	12	Go ahead.
11 12 13	Q (By Ms. Quijano) Would you repeat your answer?	12) (13)	Go ahead. THE WITNESS: Yeah.
11 12 13 14	Q (By Ms. Quijano) Would you repeat your answer? A. Yeah.	12 13 14	Go ahead. THE WITNESS: Yeah. Q (By Ms. Quijano) What kind of training did you
11 12 13 14 15	Q (By Ms. Quijano) Would you repeat your answer?A. Yeah.Q. Okay. Sorry, your answer was yes, other staff	12 13 14 15	Go ahead. THE WITNESS: Yeah. Q (By Ms. Quijano) What kind of training did you get when you got to the jail?
11 12 13 14 15	 Q (By Ms. Quijano) Would you repeat your answer? A. Yeah. Q. Okay. Sorry, your answer was yes, other staff were 	12 13 14 15 16	Go ahead. THE WITNESS: Yeah. Q (By Ms. Quijano) What kind of training did you get when you got to the jail? A. There's a book we go by and we have and we
11 12 13 14 15 16 17	 Q (By Ms. Quijano) Would you repeat your answer? A. Yeah. Q. Okay. Sorry, your answer was yes, other staff were A. Yeah. 	12 13 14 15 16 17	Go ahead. THE WITNESS: Yeah. Q (By Ms. Quijano) What kind of training did you get when you got to the jail? A. There's a book we go by and we have and we got when we trained for and we just went by that
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	Page 22		Page 24
1	Q. And did you get any on-the-job training?	1	the camera, you're looking into the security footage and
2	A. Every other Friday. So, every Friday of those	2	you can see what's happening at all times on the
3	three weeks.	3	footage?
4	Q. Okay. So, you'd go into the classroom Monday	4	A. Yeah.
5	through Thursday, and then Friday you'd be on the job?	5	Q. Okay. Is there always someone in the control
6	A. Yeah. Shadowing another person.	6	center looking at the cameras and someone roving the
7	Q. Were you trained on direct supervision versus	7	pods?
8	indirect supervision?	8	A. Yeah.
9	A. Yeah.	9	Q. Okay. Were there times when that wasn't true?
10	Q. What is the difference, to your knowledge?	10	A. What was that?
11	A. Can you repeat the question?	11	Q. Was there were there ever times that that
12	Q. Yeah.	12	wasn't true, that there wasn't someone in control and
13	What is the difference, to your knowledge,	13	roving?
14	of indirect versus direct supervision?	14	A. There's always got to be someone in control.
15	A. Direct is when you're physically seeing what	15	Q. Okay.
16	they're doing, and indirect is you don't know what	16	A. 100 percent.
17	they're doing.	17	Q. Okay. So, someone at all times should be
18	Q. That you don't know what they're doing?	18	looking at the security footage in the jail?
19	A. Yeah.	19	A. Yeah.
20	Q. Okay. Were there pods that required direct	20	Q. And my understanding on the day of the attack
21	supervision at all times, at the jail?	21	that we're talking about today, you were actually roving
22	A. All the pods.	22	the pods.
23	Q. All the pods needed direct supervision?	23	Do you remember that day?
24	A. Yes. Yeah.	24	A. Yeah.
25	Q. Were there pods that needed direct supervision	25	Q. Do you know why you were roving instead of in
	Page 23		Page 25
			9
1	all of the time?	1	control?
1 2		1 2	
	all of the time?		control?
2	all of the time? A. No.	2	control? A. Um, no, I don't I don't know why.
2	all of the time? A. No. Q. Okay. So, the Unit 400, how often were you	2 3	control? A. Um, no, I don't I don't know why. Q. Do you know if someone else was in control that
2 3 4	all of the time? A. No. Q. Okay. So, the Unit 400, how often were you trained that the supervision needed to happen in the	2 3 4	control? A. Um, no, I don't I don't know why. Q. Do you know if someone else was in control that day?
2 3 4 5	all of the time? A. No. Q. Okay. So, the Unit 400, how often were you trained that the supervision needed to happen in the pod? You actually had to be in the pod looking at what	2 3 4 5	control? A. Um, no, I don't I don't know why. Q. Do you know if someone else was in control that day? A. Yeah.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	all of the time? A. No. Q. Okay. So, the Unit 400, how often were you trained that the supervision needed to happen in the pod? You actually had to be in the pod looking at what was happening? A. My job there's two officers in that Unit 400. Q. Okay. A. My job usually is on the computer in control center. And the other one's a rover, that's his job of going in the pods. Q. Okay. So, usually you are on the computer doing what? A. Logging. Logging stuff. Logging inmates. Watching the cameras. That's about it. Q. When you're watching the cameras, are you watching that at all times? Like constantly observing the security footage? A. Yeah. Q. Okay. And so you can see into all of the pods sorry, is someone in the room with you now? A. Yeah. Well	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	control? A. Um, no, I don't I don't know why. Q. Do you know if someone else was in control that day? A. Yeah. Q. Do you know who it was? A. I had a different one in the daytime, because I worked daytime. And then I got told to stay couple more hours. And I don't know I don't know, I think it was Torres. Q. Do you know the first name? A. No, I don't know his first name. He was on nightshift; I was on dayshift. Q. Okay. So A. And he came Q. Sorry, go ahead and finish what you were saying. I interrupted you. A. No, that that's it. Q. So, he was on nightshift. You worked dayshift that day. What were the dayshift hours? A. 6 a.m 6 p.m. Q. Okay. And so on the day of the attack, on

	Page 26	Page	2.8
1	hours to cover a shift?	1 A. Yeah.	
2	A. Yeah.	Q. And then you were asked to cover the row	ver
3	Q. Do you remember how late you worked that night?	3 pod the rover officer's shift?	
4	A. I think it was to 12.	4 A. Yeah.	
5	Q. Okay. So, that day you worked 6 a.m. until	Q. Okay. I'm sorry, that was yes, right?	
6	midnight?	6 A. Yeah.	
7	A. Yeah.	7 Q. Sorry, I talked over you a little so I want	to
8	Q. So, that's, what, an 18-hour day?	8 be sure I'm clear.	
9	A. Yeah.	9 The control center, where is that locate	a
10	Q. Did you often work 18-hour days?	10 in the jail?	
11	A. There was a couple of times, but not all the	11 A. It's right in the middle of the four pods. 12 O. Okay. Is there like are there so, my	
12	times.	Q. Omy, is there me the so, my	
13	Q. So, my the attack I'm going to pull up	knowledge of jails is so, are there I want to sure I'm understanding what this is.	таке
14	this incident report. I'm going to attach this as		
15	Exhibit 1 to your deposition.	15 Is the control center like a bubble? Lik	æ
16	(Exhibit 1 marked for identification.)	16 you have windows 17 A. Yeah.	
17	Q (By Ms. Quijano) And let me know if you can see	17 A. Yean. 18 O on it?	
18	this on your screen. Do you see this?	19 And so those windows look in to each p	od?
19	A. Yeah.	20 A. Yeah.	ou.
20	Q. Okay. There's a timeline here on the second	21 Q. Okay. So, there's an officer at all times i	n
21	page, and here it says: (Reading)	the middle of the four pods with windows all ar	
22	9:57 the battery starts.	23 A. Yeah.	ounu.
23	Do you see that line? A. Yeah.	Q. And there are also camera monitors	
24		25 A. Yeah.	
(25)	Q. So, just before 10 p.m. is when the attack		
	Page (27)	Page	29
1	stanted on that day?		
_		O in that control center?	
2.	started on that day? A Yeah	1 Q in that control center? 2 A Yeah	
3	A. Yeah.	2 A. Yeah.	
_	A. Yeah.Q. So, at that point you had been working	 A. Yeah. Q. Okay. So, at all times the controls the 	ıtes
3	A. Yeah.	 A. Yeah. Q. Okay. So, at all times the controls the 	tes
(3) (4)	A. Yeah.Q. So, at that point you had been working16 hours?	A. Yeah. Q. Okay. So, at all times the controls the officer in control can see physically see the inma	tes
3 4 5	A. Yeah. Q. So, at that point you had been working 16 hours? A. Yep.	A. Yeah. Q. Okay. So, at all times the controls the officer in control can see physically see the inma and can look at the security footage?	tes
(3) (4) (5) (6)	A. Yeah.Q. So, at that point you had been working16 hours?A. Yep.Q. Sorry, what was your answer?	A. Yeah. Q. Okay. So, at all times the controls the officer in control can see physically see the inma and can look at the security footage? A. Yeah.	
3 4 5 6	 A. Yeah. Q. So, at that point you had been working 16 hours? A. Yep. Q. Sorry, what was your answer? A. Yeah. 	A. Yeah. Q. Okay. So, at all times the controls the officer in control can see physically see the inma and can look at the security footage? A. Yeah. Q. Is there any point in time that an officer in	
3 4 5 6 7	 A. Yeah. Q. So, at that point you had been working 16 hours? A. Yep. Q. Sorry, what was your answer? A. Yeah. Q. Okay. At that point in the day, were you 	A. Yeah. Q. Okay. So, at all times the controls the officer in control can see physically see the inma and can look at the security footage? A. Yeah. Q. Is there any point in time that an officer in the control center should leave their post during the center of the ce	
3 4 5 6 7 8 9	 A. Yeah. Q. So, at that point you had been working 16 hours? A. Yep. Q. Sorry, what was your answer? A. Yeah. Q. Okay. At that point in the day, were you tired? 	A. Yeah. Q. Okay. So, at all times the controls the officer in control can see physically see the inma and can look at the security footage? A. Yeah. Q. Is there any point in time that an officer in the control center should leave their post during the shift?	
3 4 5 6 7 8 9	A. Yeah. Q. So, at that point you had been working 16 hours? A. Yep. Q. Sorry, what was your answer? A. Yeah. Q. Okay. At that point in the day, were you tired? A. I'm always tired.	A. Yeah. Q. Okay. So, at all times the controls the officer in control can see physically see the inma and can look at the security footage? A. Yeah. Q. Is there any point in time that an officer in the control center should leave their post during the shift? A. No. It should be someone in there all the	
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Yeah. Q. So, at that point you had been working 16 hours? A. Yep. Q. Sorry, what was your answer? A. Yeah. Q. Okay. At that point in the day, were you tired? A. I'm always tired. Q. Okay. So, yes, you were tired at that point? A. Yeah. Q. Were you ready to go home at that point? A. Yeah. Q. Were you frustrated that you were asked to work an extra shift? MR. BOJANOWSKI: Objection. Go ahead. THE WITNESS: Yeah. Q (By Ms. Quijano) So, the dayshift that you worked from 6 a.m. to 6 p.m., were you roving the pods or were you in control? A. I was — I think I was control.	A. Yeah. Q. Okay. So, at all times the controls the officer in control can see physically see the inmate and can look at the security footage? A. Yeah. Q. Is there any point in time that an officer in the control center should leave their post during the shift? A. No. It should be someone in there all the time. Q. And so if someone left the control center, would that have been a policy violation? A. Yeah. Q. And if someone does leave, let's what happens if you need to go to the bathroom, for example what are you supposed to do? A. The rover's supposed to cover the the control. Q. Okay. So, if someone in the control center of that night left the control center, they would have asked they should have asked you A. Yeah.	neir mple?

Page 42		Page '
Q. Okay. And you just don't remember?	1	control to your lawyers and to Paul Baca Court
A. I don't remember, yeah.	2	Reporters.
Q. Okay. So, I'm going to show you well, on	3	Belen, is there some control on your end
the same photo sorry, I didn't mean to stop sharing	4	that will allow him to have remote control access?
it here.	5	(Discussion off the record.)
Is this you on the top left here?	6	MS. QUIJANO: Okay. Let me try this
A. Looks like it, yeah.	7	again. All right. It's not letting me give you access
Q. Okay. And do you see these coverings on the	8	to it. Let's take a quick break and see if we can
cell that you're at?	9	figure this out.
A. Yeah.	10	(Off the record 10:11 a.m. to 10:25 a.m.
Q. Did you ask the inmates to take these coverings	11	Q (By Ms. Quijano) Okay. So, we can't figure
down, to your memory?	12	how to get you remote access for some reason. You
A. Yeah.	13	the only one I'm not able to give remote access to. S
Q. Okay. You didn't take them down, though?	14	what I'm going to do is I have this little star stamp,
A. No.	15	it's going to create like a blue stamp wherever I clic
Q. Did you make sure that they were taken down?	16	So, you said there were four watch
A. Yeah.	17	watch guard buttons?
Q. And you knew that leaving them up caused the	18	A. Yeah.
risk of not being able to see what was happening in that	19	Q. Okay. And I want to make sure we're clear,
cell?	20	if you could say yes or no.
A. Yeah.	21	Yes, there are four?
MR. BOJANOWSKI: I'm going to object to	22	A. Yes.
form.	23	Q. Okay. And where is the first one?
THE WITNESS: Yeah.	24	A. Uh, the top railing on the right side.
Q (By Ms. Quijano) How often were you supposed to	25	Q. On the right side right here where my mouse
Page 43		Page ·
be roving the cells? How often were you supposed to be	1	A. Yeah.
in each pod?	2	Q. Okay.
A. There's these buttons called watch tours	3	A. And there'd be one on the bottom in the same
buttons, and they reset every hour. And in that hour	4	place.
you have to go in there and, basically, just touch all	5	Q. On like down here on this wall behind the
the watch tower buttons.	6	stairs?
Q. Okay. So, once an hour you have to go through	7	A. The same place as the other one. Should be on
and push a button on each in each pod?	8	the other side. Yeah, right there.
A. Yeah. There's four buttons in each pod.	9	Q. Okay. And then where is the third?
Q. Okay. So, the buttons are in four different	10	A. The you know what, I think this one has six.
areas in the pod?	11	Q. Okay.
A. Yeah.	12	A. Because some pods have because I'm I
Q. Okay. I'm going to pull this actually pull	13	think I remember where I'm at. I touched the button at
this photo up again. Would you be able to mark on this	14	the watch tower right there.
photo where those buttons were?	15	Q. Okay. That's you pushing the button right no
A. Um, mark?	16	A. Yeah. Yeah.
Q. Yeah. I can what I can do is give you	17	Q. Okay. I'll put one right here at
access of the controller, and you can actually draw on	18	A. And then there's the one on the bottom, the
this with your mouse pad. So, give me a second to do	19	same place.
that and I'll attach that as Exhibit 3 to your	20	Q. Okay.
deposition.	21	A. And the other side of the pods where the stairs
(Exhibit 3 marked for identification.)	22	at, those were the same the same place as the other
MS. QUIJANO: I'm just going to take a	23	side.
photo of this section and then it won't let me give	24	Q. Over here (indicating)?
you control for some reason. It will allow me to give	25	A. Yeah.
Jon control for bothe reason. It will allow like to give	1 23	

	Page 58		Page 60
1	were in control?	1	MR. BOJANOWSKI: Objection.
2	A. Yes.	2	THE WITNESS: Yeah. Yes.
3	Q. Do you recognize these initials? Do you know	3 Q	(By Ms. Quijano) Did people so, you
4	the person who was working with you that day?		oned you were terminated for falling asleep.
5	A. Yes.	(5)	Did people fall asleep on shift while you
6	Q. Who was it?	6 were t	
7	A. Desiderio.	7)	MR. BOJANOWSKI: Same objection.
8	Q. Desiderio?	(8)	THE WITNESS: Yes.
9	(Court reporter clarification.)	9 0	(By Ms. Quijano) How often was that happening?
10	THE WITNESS: Desiderio.	(10)	MR. BOJANOWSKI: Same objection.
11	Q (By Ms. Quijano) And that's D-E-S-D-I-R-I-O	(11)	Go ahead.
12	(sic)?	12)	THE WITNESS: Often.
13	A. Yeah.	13) O	(By Ms. Quijano) Was it frustrating for you
14	Q. R-I-O? Okay.		to be terminated when you knew that was happening
15	Oh, is it here? D-O-D-S-R-D-E-R-O?		time at the jail?
16	A. Yeah. That's it right there.		Yes.
17	Q. I-O? Okay.	17	MR. BOJANOWSKI: Same objection.
18	Okay. And so it looks like throughout	18	Go ahead.
19	this day the handwriting's switching back and forth.		(By Ms. Quijano) Did you say anything about it
20	Was it common for you to switch back and forth between	_	ninistration when you were terminated?
21	control and rovering?	21 A.	· ·
22	A. With this partner, yes.		How often were people sleeping on the job?
23	Q. Was it different for other people you worked	23	MR. BOJANOWSKI: Same objection.
24	with?	24	Go ahead.
25	A. Yes.	25	THE WITNESS: Often.
			Page 61
		1 0	_
1	Q. Okay. Why was it different with her?	_	(By Ms. Quijano) Was it everyone or was it a
2	A. Because we both understood that we know how it	2 select	
3	feels to sit in the control center all day and we just		Select few.
4	gave each other breaks not breaks, but like breaks of	4	MR. BOJANOWSKI: Same objection.
5	sitting down.	_	(By Ms. Quijano) And were they people that were
6	Q. Okay. And so did you prefer to be roving	6 freque	ently working control?
7	instead of being in the control center?		MR. BOJANOWSKI: Same objection.
8	A. I preferred we switch every now and then.	8	Go ahead.
9	Q. Okay. Did other people not switch with you,	9 10 contro	THE WITNESS: So, it was a mix, rover and
10	like Desiderio did?	10 contro	
11	A. Yeah. I was I with other people I was in	-	(By Ms. Quijano) Okay. And was it a certain
12	the in the control center all day.		that they were more likely to fall asleep on
13	Q. Were people was that because people didn't	13 shift?	
14	want to be stuck in the control center to give you	14	MR. BOJANOWSKI: Same objection.
15	breaks?	15	Go ahead.
16	A. Yeah.	16	THE WITNESS: Can you repeat the question?
17	Q. And why is that, to your knowledge?	_	(By Ms. Quijano) Yeah.
18	A. It's I don't know.	18	Was it was there a certain shift that
19	Q. Did people not like working in control?	-	were more likely to fall asleep on job?
20	A. Yeah.	20	MR. BOJANOWSKI: Same objection.
21	Q. Why not?	21	Go ahead.
22	A. Because to log everything down.	22	THE WITNESS: Nightshift. (Pv. Ma. Onijana) And this is going to seem
23	Q. Is it is it like boring, or do you know why they didn't like logging everything down?	_	(By Ms. Quijano) And this is going to seem
0.4		24 obvio	us, but do you know why that was more often?
24 25	A. Probably boring	25	MR. BOJANOWSKI: Same objection.

Page 98	Page 1
A. Yes.	you worked for? That supervised you?
Q. Do you remember, were his clothes covered in	2 MR. BOJANOWSKI: Objection.
blood?	Go ahead.
A. Yes. His shirt.	4 THE WITNESS: Yes.
Q. Okay. So, let me pull up a photo here. So,	5 Q (By Ms. Quijano) What did you dislike?
this is on Bates number CCCC_18. So, there's a photo of	6 MR. BOJANOWSKI: Objection.
him here, I don't see any blood on his shirt.	7 Go ahead.
Do you see any blood on his shirt?	8 THE WITNESS: Hours.
A. No.	9 Q (By Ms. Quijano) Okay. The long hours?
Q. Would this have photo been taken some time	10 A. Yeah. And there's something called a draft.
after he had been given new clothes?	11 Q. Okay.
A. Yes.	A. When someone has to stay, the person who did
MR. BOJANOWSKI: Objection.	stay last time would have to stay. But it felt like I
Go ahead.	stayed there most of the time instead of them spreading
Q (By Ms. Quijano) Do you have any understanding	out who stayed or not. It I felt like it was just me
if this photo was taken before or after he was taken to	that was staying most of the time.
the hospital?	Q. And was that frustrating to be called to stay
MR. BOJANOWSKI: Same objection.	late, past your shift, that frequently?
Go ahead.	19 MR. BOJANOWSKI: Objection.
THE WITNESS: I don't know about that.	20 Go ahead.
	21 THE WITNESS: Yes.
Q (By Ms. Quijano) Okay. When you found him, was	Q (By Ms. Quijano) Sorry, was the answer yes
he covered in more blood than he is in this photo?	23 A. Yes.
MR. BOJANOWSKI: Same objection.	Q. And what other complaints did you have ab
Go ahead.	Q. And what other complaints did you have an
THE WITNESS, Voc	vour job and the way
THE WITNESS: Yes.	your job and the way
THE WITNESS: Yes. Page 99	your job and the way Page 1
Page 99	(Page) (1
Page 99 (By Ms. Quijano) Okay. Did you like working at	Page 1 MR. BOJANOWSKI: Same objection.
Page 99 Q (By Ms. Quijano) Okay. Did you like working at the jail?	Page 1 MR. BOJANOWSKI: Same objection. Q (By Ms. Quijano) and the way you were
Page 99 Q (By Ms. Quijano) Okay. Did you like working at the jail? MR. BAJANOWSKI: Objection.	Page 1 MR. BOJANOWSKI: Same objection. Q (By Ms. Quijano) and the way you were supervised?
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)') MP ROLANOW/SKI: Objection 1 00 L	as iess
22 MR. BOJANOWSKI: Objection. 22 boring than sitting there? 23 MP. BOJANOWSKI: Objection. 23 MP. BOJANOWSKI: Objection	
23 Go ahead. 23 MR. BOJANOWSKI: Objection. 24 THE WITNESS: Unit 400. 24 Go ahead.	
25 Q (By Ms. Quijano) Okay. So, Unit 400 was the 25 THE WITNESS: Yes.	
25 Q (D) MS. Quijano) Okay. 50, Ont. 400 was tile 25 THE WITNESS. 168.	

	Page 106		Page 108
1	Q (By Ms. Quijano) Okay. Are you glad to no	1	MR. BOJANOWSKI: Objection.
2	longer be working there?	2	Go ahead.
3	MS. QUIJANO: Objection.	3	THE WITNESS: He would come like two times
4	Go ahead.	4	out of a month to, you know, 400.
5	THE WITNESS: Yes.	5	Q (By Ms. Quijano) So, you didn't did you see
6	Q (By Ms. Quijano) Were there any other things	6	him often?
7	that like your supervisor, the warden, sergeants,	7	A. No.
8	lieutenants did that you thought were wrong or poorly	8	Q. Do you did you feel that he had any
9	done?	9	understanding of what was happening in that facility
10	MR. BOJANOWSKI: Objection.	10	when you worked there?
11	Go ahead.	11	MR. BOJANOWSKI: Objection.
12	THE WITNESS: No.	12	Go ahead.
13	Q (By Ms. Quijano) Just the staffing? The	13	THE WITNESS: I do not know.
14	scheduling?	14	Q (By Ms. Quijano) Do you think there was any way
15	A. Yes.	15	for him to have known with how infrequently you saw him?
16	MS. QUIJANO: Objection.	16	MR. BOJANOWSKI: Objection.
17	Go ahead.	17	Go ahead.
18	THE WITNESS: Yes.	18	THE WITNESS: I don't know.
19	Q (By Ms. Quijano) Did you feel like policies and	19	MS. QUIJANO: Okay. Those are all of my
20	procedures were enforced or monitored by the the jail	20	questions. I appreciate you taking your morning. I
21	staff?	21	know this is a frustrating process to make sure this is
22	MR. BOJANOWSKI: Objection.	22	clear, but I appreciate your patience with it.
23	Go ahead.	23	And I pass the witness.
24	You're asking him to testify as to what	24	MR. BOJANOWSKI: Okay. We'll read and
25	other people are doing?	25	sign. Thank you.
	Page 107		Page 109
1	MS. QUIJANO: If he felt they were	1	(Deposition concluded at 11:46 a.m.)
2	MR. BOJANOWSKI: Well, what he feels isn't	2	**********
3	really relevant, but	3	
4	MS. QUIJANO: That's fine. You can	4	DEPONENT SIGNATURE/CORRECTION PAGE
5	object. But I'm going to	5 6	If there is any typographical errors to your deposition, indicate them below:
6	MR. BOJANOWSKI: All right. Yeah, I	7	PAGE LINE
7	just I I am. It's just I want to be clear as to	8	Change to
8	the question you're asking. Are you asking him what	9	Change to
9	other staff has felt	10	Change to
10	MS. QUIJANO: No.	11	Change to
11	MR. BOJANOWSKI: about working there?	12	Any other changes to your deposition are to be
12	Maybe just rephrase the question so I can better	13	listed below with a statement as to the reason for such change.
13	understand.	14	PAGE LINE CORRECTION REASON FOR CHANGE
14	MS. QUIJANO: Okay. I'll restate my	15	
15	question.	16	
16	Q (By Ms. Quijano) Did you feel that policies and	17	
17	procedures were properly enforced by jail staff?	18	
18 19	MR. BOJANOWSKI: Same objection. (THE WITNESS: Yes.)	19 20	
20	Q (By Ms. Quijano) Okay. Were the warden an	21	I, GARRICK PETERSON, do hereby certify that I have
21	admin or assistant warden on-site frequently?		read the foregoing transcript of my deposition taken
22	A. Yes. She was frequently there.	22	MARCH 15, 2022, as transcribed, and that it is a true
23	Q. What about the warden?		and correct record of my testimony given at the time,
24	A. Sometimes would be there, but not all the time.	23	except as to any corrections submitted.
25	Q. Was he frequently not there?	24 25	